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U.S. DISTRICT COURT  
SOUTHERN DISTRICT  
OF OHIO-COLUMBUS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DAMON S. LLOYD	:	Case No. 2:25-CV-118
Plaintiff	:	
-v-	:	District Judge Michael Watson
CORBY FREE, et al.	:	Magistrate Kimberly Jolson
Defendants	:	

PLAINTIFF'S AMENDED COMPLAINT

NOW COMES Plaintiff, Damon S. Lloyd, and hereby submits his Amended Complaint in the above-captioned case.

42 USCS §1983 gives Plaintiff the remedy-action at law for proceeding of redress to parties deprived of constitutional rights, privileges, and immunities by official's abuse of their position. Persons who are denied rights guaranteed to them under federal law may vindicate these rights in appropriate cases by various remedies in federal courts to obtain an injunction under 42 USCS §1983. Moreover, focus of §1983 is "on misuse of power possessed by virtue of state law and made possible only because wrongdoer is clothed with authority of state law." It should likewise be duly noted that the Defendants herein in their official capacities is equivalent to a suit brought against a government entity. **Carpenter v. Knapp**, 2024 U.S. Dist. LEXIS 144230.

As ordered by Magistrate Jolson, Plaintiff will provide additional "facts in support of Plaintiff's claims, the names and specific actions of the Defendants, and the relief requested."

The linchpin in the case sub judice is the deliberate blocking and/or suspension in my digital player, which began on or about August 25, 2024. The accounts in question were the various law professors, agencies, and advocacy groups that could be utilized in my ongoing redress of wrongful incarceration. This matter was properly exhausted in the requisite grievance procedures. (Request #479640171).

On September 1, 2024, Lt. D. Cannon directed my grievance to Ms. Magee and changed my status from open to closed. (Request #482061171).

On September 16, 2024, Lt. D. Cannon arranged a meeting to clarify the issue. (Grievance #484457031).

On October 2, 2024, Investigator A. Lindsey directed Plaintiff to Institutional Inspector Corby Free and changed status from open to closed. (Request #490744311).

On October 15, 2024, Institutional Inspector Corby Free posited some opaque response denying my grievance, including an erroneous theory of religious accommodation in conjunction of another inmate J. Dameron who has nothing to do with this action. (Grievance #491644801).

On October 16, 2024, I sent my grievance to Chief Inspector K. Morrow who denied my grievance. (Grievance #495371991).

On November 4, 2024, Chief Inspector K. Morrow did not find Inspector Corby Free responsible but that IIS Corby Free was awaiting a response from Viapath as to the denials of contacts. (Grievance #498974641).


On November 6, 2024, IIS Corby Free stated that "the accounts were not suspended by individuals @ CCI and were actions from someone outside of our agency and not a grievable action." (Grievance #491644801).

As held in **Bell v. Washington**, 2024 U.S. Dist. LEXIS 109829, Plaintiff's claim "has facial plausibility as Plaintiff pleads factual content that allows the court to draw a reasonable inference that the Defendants are liable for the misconduct alleged." Plaintiff's complaint creates more than speculation or suspicion of a legally cognizable cause of action; it shows entitlement and a plausible claim for relief.

The litany of state actors who have deliberately forestalled Plaintiff's access to legal aid include IIS Corby Free, DRC Legal Counsel, Christopher Lambert, and Chief IIS Karen Morrow.

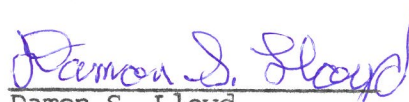
Plaintiff respectfully requests this Court issue a Declaratory Judgment and Injunctive Relief for the state actors to cease and desist from withholding valuable assistance, including but not limited to, unencrypting the twenty-five contacts in his digital media account and any other relief this Court deem just and proper.

Respectfully submitted,

 3-10-2025  
Damon S. Lloyd  
15802 State Route 104 N  
Chillicothe, Ohio 45601

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Amend Complaint was mailed via regular U.S. Mail on this 17<sup>th</sup> day of March 2025.

  
Damon S. Lloyd